

PROTOCOL FOR AUDIT OF 2008 SFI FILINGS

SELECTION: An initial selection of 5% of names of all required filers shall be made on or about May 1, 2008. The selection shall be made through the use of computerized randomization of all required filers, with no weighted criteria.

REVIEW FOR COMPLETENESS: The following initial tasks will be performed:

1. Check if signed
2. Check if Confidential Addendum filed
3. Check if timely filed and dated
4. Ensure that form is the 2008 form
5. Check to ensure that each question was answered
6. Check to ensure that state income is disclosed (#11)
7. Determine whether patterns of responses suggest intentional deficiencies (e.g., filer enters no substantive info and checks all “none applicable” boxes)

ANALYSIS: The following analytical tasks will be performed:

1. Compare with previous year’s filings (if any)
2. Perform asset search to confirm accuracy of property disclosure (#6)
3. Search any “business associated with,” “non-profit” or “trust” (#7-10) to determine if any conflict exists and/or whether the business is:
 - a. Associated with someone regulated by filer’s agency
 - b. Associated with a lobbyist who lobbies filer’s agency
 - c. Associated with a contractor who has contracts with filer’s agency
4. Compare with filings made by spouse (if a filer) or a dependent child (if a filer)
5. Review state contractors list to determine if any income or business association is related to a state contractor (#7, 10, 11).
6. Search disclosed securities and entities that hold them (#13) to determine if any conflict exists and/or whether the ownership or the holder is:
 - a. Associated with someone regulated by filer’s agency
 - b. Associated with a lobbyist who lobbies filer’s agency
 - c. Associated with a contractor who has contracts with filer’s agency
7. Search any disclosed lease or contract (#14-15) to determine if the contract or lease is held with the filer’s agency.

Additional analysis may be necessary or appropriate if any adverse findings occur as a result of the above. If it is determined that an underdisclosure exists, but no other ethics code violation is indicated or suggested, the filer will be given a nominal grace period to amend the form. Upon expiration of the grace period, if the deficiencies have not been corrected, a notice of a UAPA hearing will be issued to the filer, at which point the Enforcement Division will seek penalties pursuant to Gen. Stat. sec. 1-88(b). If additional substantive ethics code violations are indicated or suggested by the audit, the Division will make a determination on a case-by-case basis as to how to proceed.